

NOTICE OF INTENT

Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Expedited Permit Processing Program
(LAC 33:I.1801, 1803, 1805, 1807, and 1809) (OS073)

Under the authority of the Environmental Quality Act, R.S. 30:2001 et seq., and in accordance with the provisions of the Administrative Procedure Act, R.S. 49:950 et seq., the secretary gives notice that rulemaking procedures have been initiated to amend the Office of the Secretary regulations, LAC 33:I.1801, 1803, 1805, 1807, and 1809 (Log #OS073).

This rule provides for an expedited permit processing program and the implementation of the associated permitting fees authorized by Acts 586 and 779 of the 2006 Regular Session of the Louisiana Legislature. This program allows interested applicants who request such processing to reimburse the department for overtime costs incurred by department employees who work overtime to expedite an application for a permit, modification, license, registration, or variance. The statutes also allow the department to hire contractors to perform this work if deemed necessary. Many companies consider environmental permitting timelines when determining where to locate a proposed facility. Expedited permit processing allows the regulated community to act more quickly in response to market demands and conditions. Commencement of any necessary construction and operations may be authorized more expeditiously. This rule promulgates the provisions of Emergency Rule OS073E, which implemented a pilot program for this service on July 31, 2006. The basis and rationale for this rule are to shorten the permit processing time by allowing the department to offer paid overtime to employees to expedite the permit processing and recoup the costs of that overtime pay.

This proposed rule meets an exception listed in R.S. 30:2019(D)(2) and R.S. 49:953(G)(3); therefore, no report regarding environmental/health benefits and social/economic costs is required. This proposed rule has no known impact on family formation, stability, and autonomy as described in R.S. 49:972.

A public hearing will be held on April 25, 2007, at 1:30 p.m. in the Galvez Building, Oliver Pollock Conference Room, 602 N. Fifth Street, Baton Rouge, LA 70802. Interested persons are invited to attend and submit oral comments on the proposed amendments. Should individuals with a disability need an accommodation in order to participate, contact Judith A. Schuerman, Ph.D., at the address given below or at (225) 219-3550. Parking in the Galvez Garage is free with a validated parking ticket.

All interested persons are invited to submit written comments on the proposed regulation. Persons commenting should reference this proposed regulation by OS073. Such comments must be received no later than May 2, 2007, at 4:30 p.m., and should be sent to Judith A. Schuerman, Ph.D., Office of the Secretary, Legal Affairs Division, Box 4302, Baton Rouge, LA 70821-4302 or to FAX (225) 219-3582 or by e-mail to judith.schuerman@la.gov. Copies of this proposed regulation can be purchased by contacting the DEQ Public Records Center at (225) 219-3168.

Check or money order is required in advance for each copy of OS073. This regulation is available on the Internet at www.deq.louisiana.gov/portal/tabid/1669/default.aspx.

This proposed regulation is available for inspection at the following DEQ office locations from 8 a.m. until 4:30 p.m.: 602 N. Fifth Street, Baton Rouge, LA 70802; 1823 Highway 546, West Monroe, LA 71292; State Office Building, 1525 Fairfield Avenue, Shreveport, LA 71101; 1301 Gadwall Street, Lake Charles, LA 70615; 111 New Center Drive, Lafayette, LA 70508; 110 Barataria Street, Lockport, LA 70374; 645 N. Lotus Drive, Suite C, Mandeville, LA 70471.

Herman Robinson, CPM
Executive Counsel

Title 33

ENVIRONMENTAL QUALITY

Part I. Office of the Secretary

Subpart 1. Departmental Administrative Procedures

Chapter 18. Expedited Permit Processing Program

§1801. Scope

A. This Chapter establishes a program to expedite the processing of permits, modifications, licenses, registrations, or variances for environmental permit applicants who may request such services. Expedited processing of an application for a permit, modification, license, registration, or variance is an exercise of the discretion of the administrative authority and is subject to the availability of resources needed in order to process the permit, modification, license, registration, or variance. Permit actions approved for expedited permit processing must meet all regulatory requirements, including required public comment periods and any required review by other agencies.

B. Eligibility

1. An application for an initial permit or permit modification necessary for new construction as required by the Environmental Quality Act or regulation is eligible for expedited permit processing.

2. An application for permit modification that does not result in new permanent jobs is eligible for expedited processing pursuant to the provisions of this Chapter if it is associated with new construction; includes increases in production that benefit the national, state, or local economy; or provides a direct benefit to the environment.

3. Applications for permit renewal and/or reconciliation will be considered for expedited processing pursuant to the provisions of this Chapter on a case-by-case basis.

4. Applications for permits, modifications, licenses, registrations, or variances under the Solid Waste and Hazardous Waste programs are not eligible for expedited permit processing.

5. A request for expedited permit processing submitted prior to submittal of the associated permit application will not be considered.

6. Requests for exemptions, letters of no objection, and other miscellaneous letters of response are not eligible for expedited permit processing.

C. To the extent practicable, requests proposing new construction and requests that will result in the creation of new permanent jobs will be given highest consideration.

D. Approval of a request for expedited permit processing in no way guarantees issuance of the permit action or issuance of the permit action by the date requested.

E. The department may deny a request for expedited permit processing for any reason, including but not limited to the following:

1. the applicant's failure to pay outstanding fees or penalties;
2. compliance history concerns regarding the applicant;
3. an infeasible date requested for permit action;
4. an insufficient maximum amount the applicant is willing to pay; or
5. insufficient workforce resources available to assign to the task or a request not in line with department priorities.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2014.5

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of the Secretary, Legal Affairs Division, LR 33:**.

§1803. Procedures

A. Requests for expedited permit processing shall be submitted using the approved form. The approved form is available on the official website for the department. Hard copies may be obtained from the Office of Environmental Services, Environmental Assistance Division.

B. Within 10 working days after receipt of a request for expedited processing of any permit, modification, license, registration, or variance, the administrative authority shall issue a decision to grant or deny the expedited processing request.

C. Permit Applications. The following are additional permit application requirements for facilities requesting expedited permit processing.

1. If requested by the department, the applicant shall submit permit application information electronically using the Air Permit Data Upload (APDU) system or any other electronic data submittal program provided by the department.

2. Prior to submittal of a permit application for a new major source, a new synthetic minor source, or a major modification of an existing source, a technical meeting with a representative of the department is recommended to review and discuss the proposed application.

D. Requests for Additional Information

1. If at any time during the review process of an application the administrative authority determines that additional information is necessary, the administrative authority shall notify the applicant and require a response from the applicant within a specified time.

2. The applicant shall respond to the request for additional information within the time specified by the administrative authority. Such a response shall contain all information required by the administrative authority.

3. The administrative authority may cease expedited processing of an application for a permit, modification, license, registration, or variance in accordance with the provisions of this Chapter if the applicant fails to supply the requested additional information by the specified time.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30: 2014.5.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of the Secretary, Legal Affairs Division, LR 33:**.

§1805. Fees

A. In addition to the fees charged pursuant to R.S. 30:2014, a fee shall be charged for each application for a permit, modification, license, registration, or variance that is processed on an expedited basis in accordance with the provisions of this Chapter.

1. An appropriate fee shall be computed based on the maximum per hour overtime salary, including associated related benefits, of the civil service employee of the department who performs the work.

2. The fee shall be computed by multiplying the salary figure from Paragraph A.1 of this Section by every overtime hour or portion thereof that a department employee or contractor works on expedited processing of the application for a permit, modification, license, registration, or variance.

3. The applicant may request that the expedited permit processing fee not exceed a maximum amount. If such a maximum amount is established, the number of overtime hours a department employee or contractor works processing the application for a permit, modification, license, registration, or variance shall be limited accordingly. If further processing of the application is required, the department's continued review will not follow the provisions of this Chapter, and the request will no longer be handled on an expedited basis, unless the applicant agrees in writing to pay the expedited fees required to complete the expedited processing of the permit action.

B. In the event that the administrative authority ceases processing an application for a permit, modification, license, registration, or variance in accordance with LAC 33:I.1803.D.3 or Paragraph A.3 of this Section, a fee will be charged for every overtime hour or portion thereof that a department employee or contractor worked on expedited processing of the subject application for a permit, modification, license, registration, or variance.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30: 2014.5 and 6.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of the Secretary, Legal Affairs Division, LR 33:**.

§1807. Invoicing and Failure to Pay

A. An invoice for the expedited permit processing fee shall be transmitted to the applicant after the administrative authority has made a decision to grant or deny the permit, modification, license, registration, or variance.

B. If the administrative authority has ceased processing the permit application in accordance with LAC 33:I.1803.D.3 or 1805.A.3, an invoice for the appropriate expedited permit processing fee shall be transmitted to the applicant.

C. Failure to pay the expedited permit processing fee by the due date specified on the invoice constitutes a violation of these regulations and shall subject the applicant to relevant enforcement action under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the permit, modification, license, registration, or variance.

D. A permit appeal, whether by the applicant or a third party, shall not stay the requirement to pay the expedited permit processing fee.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30: 2014.5 and 6.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of the Secretary, Legal Affairs Division, LR 33:**.

§1809. Public Notice and Availability of Records

A. Requirement to Provide Public Notice. The department shall provide notice of each request for expedited processing of an application for a permit, modification, license, registration, or variance that is processed pursuant to the provisions of this Chapter.

1. The notice of expedited permit processing shall be provided on the official website for the department.

2. For draft or proposed permit actions subject to public notice requirements under other regulations or program requirements, such public notice shall indicate that the draft or proposed permit was processed under the expedited permit processing provisions of this Chapter.

B. Contents of the Notice

1. The notice on the official website for the department shall contain the name of the applicant/permittee, the agency interest number, the parish in which the facility is physically located, the environmental medium involved, the date the request for expedited processing was received, and the date of the decision to approve or deny the request for expedited processing.

2. For draft or proposed permit actions subject to public notice requirements under other regulations or program requirements, in addition to such requirements, the public notice shall contain a statement that the draft or proposed permit was processed under the expedited permit processing provisions of this Chapter.

C. Availability of Records. All recorded information concerning a request for expedited processing (completed permit application form, fact sheet or statement of basis, draft and proposed permits, or any other public document) not classified as confidential information under R.S. 30:2030(A) or 30:2074(D) or not designated confidential in accordance with applicable regulations shall be made available to the public for inspection and copying in accordance with the Public Records Act, R.S. 44:1 et seq.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30: 2014.5.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of the Secretary, Legal Affairs Division, LR 33:**.

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULESLOG #: OS073

Person

Preparing

Statement: Cheryl Sonnier NolanPhone: (225) 219-3001Dept.: Department of Environmental QualityOffice: Office of Environmental Services

Return

Address: P.O. Box 4313
Baton Rouge, LA 70821-4313

Rule

Title: Expedited Permit Processing
Program (LAC 33:1.Chapter 18)

Date Rule

Takes Effect: Upon Promulgation

SUMMARY

(Use complete sentences)

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND WILL BE PUBLISHED IN THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

There are additional administrative duties associated with implementing the expedited permit processing program. Annual administrative costs are estimated to be \$53,760.47.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS (Summary)

This rule allows LDEQ to charge a separate fee for each permit, modification, license, registration, or variance that is processed on an expedited basis. Because all revenue generated will be used to compensate the employee or contractor for the services performed, there will be no net increase in revenues in excess of expenditures associated with the proposed action.

III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS (Summary)

Participation in the Expedited Permit Processing Program is voluntary. The applicant must complete a brief "Request for Expedited Permit Processing" form and pay a fee in addition to those charged pursuant to R.S. 30:2014. The fee will be based on the actual number of overtime hours an employee works (or hours a contractor works) to process the application, which will be highly dependent on the size and complexity of the project. The applicant may, however, request that the expedited permit processing fee not exceed a maximum amount.

Expedited permit processing allows the regulated community to act more quickly in response to market demands and conditions. Commencement of any necessary construction and operations may be authorized more expeditiously. As such, the revenue generated by the project would also be realized sooner.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)

There will be no effect on competition or employment in the public or private sectors. A final decision on each application must still adhere to the statutory deadlines imposed by R.S. 30:2022(B) and other applicable regulations, regardless of whether or not it is processed on an "expedited" basis.

Signature of Agency Head or Designee

Legislative Fiscal Officer or DesigneeHerman Robinson, CPM, Executive Counsel

Typed Name and Title of Agency Head or Designee

Date of Signature

Date of Signature

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

The following information is requested in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

- A. Provide a brief summary of the content of the rule (if proposed for adoption, or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

Acts 586 and 779 of the 2006 Regular Legislative Session authorized the department to develop an expedited permit processing program. The program allows interested applicants to reimburse the department for overtime costs incurred by LDEQ employees that work overtime to expedite a permit, modification, license, registration, or variance application. These statutes also afford the department the opportunity to hire contractors to perform this work if deemed necessary.

- B. Summarize the circumstances which require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

Senate Bill No. 292 of the 2006 Regular Session was signed by Governor Blanco on June 23, 2006. Act 586, which enacted R.S. 30:2014.5 and became effective on August 15, 2006, allows LDEQ to develop and implement a program to expedite the processing of applications for permits, modifications, licenses, registrations, or variances for applicants who may request such processing. R.S. 30:2014.5 requires LDEQ to adopt rules in accordance with the Administrative Procedure Act.

- C. Compliance with Act 11 of the 1986 First Extraordinary Session

- (1) Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

No, this proposed rule will not result in any net increase in the expenditure of funds.

- (2) If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?

(a) ____ Yes. If yes, attach documentation.

(b) ____ No. If no, provide justification as to why this rule change should be published at this time.

This question is not applicable.

FISCAL AND ECONOMIC IMPACT STATEMENT

WORKSHEET

I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED

1. What is the anticipated increase (decrease) in costs to implement the proposed action?

COSTS	FY 06-07	FY 07-08	FY 08-09
PERSONAL SERVICES	51,260.47	51,260.47	51,260.47
OPERATING EXPENSES	2,500.00	2,500.00	2,500.00
PROFESSIONAL SERVICES	-0-	-0-	-0-
OTHER CHARGES	-0-	-0-	-0-
EQUIPMENT	-0-	-0-	-0-
TOTAL	53,760.47	53,760.47	53,760.47
MAJOR REPAIR & CONSTR.			
POSITIONS (#)	-0-	-0-	-0-

2. Provide a narrative explanation of the costs or savings shown in "A.1.", including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

There are additional administrative duties associated with implementing the expedited permit processing program. These duties and the costs associated with each are detailed on the attached analysis entitled "Administrative Costs Associated with the Expedited Permit Processing Program."

Between July 31, 2006 (the effective date of OS073E, the emergency rule which established the Expedited Permit Processing Program as a pilot program) and January 12, 2007, LDEQ received approximately 104 "Request for Expedited Permit Processing" forms. As such, annual administrative costs are estimated to be \$53,760.47 [(\$225.91 * 104 * 12 months / 5.5 months) + \$2500.00]. Time estimates for each job title are based on actual experience acquired by implementing the pilot program.

3. Sources of funding for implementing the proposed rule or rule change.

SOURCE	FY 06-07	FY 07-08	FY 08-09
STATE GENERAL FUND	-0-	-0-	-0-
AGENCY SELF-GENERATED	-0-	-0-	-0-
DEDICATED	53,760.47	53,760.47	53,760.47
FEDERAL FUNDS	-0-	-0-	-0-
OTHER (Specify)	-0-	-0-	-0-
TOTAL	53,760.47	53,760.47	53,760.47

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

The department currently has sufficient funds to implement the proposed action.

B. COST OR SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION PROPOSED.

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and methods used in calculating this impact.

No impact on local governmental units is anticipated.

2. Indicate the sources of funding of the local governmental unit which will be affected by these costs or savings.

There are no costs or savings to local governmental units; as such, no funding is needed.

FISCAL AND ECONOMIC IMPACT STATEMENT

WORKSHEET

II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS

A. What increase (decrease) in revenues can be anticipated from the proposed action?

In addition to the fees charged pursuant to R.S. 30:2014, this rule allows LDEQ to charge a separate fee for each permit, modification, license, registration, or variance that is processed on an expedited basis. However, as described in R.S. 30:2014.6(B), this fee shall not exceed the maximum per hour overtime salary, including associated related benefits, of a civil service employee of the department who performs to work. The final amount is based on the actual number of overtime hours or portion thereof that the employee works (or the number of hours or portion thereof a contractor works) processing the expedited permit. Because all revenue generated will be used to compensate the employee or contractor for the services performed, there will be no net increase in revenues associated with the proposed action.

REVENUE INCREASE/DECREASE	FY 06-07	FY 07-08	FY 08-09
STATE GENERAL FUND	-0-	-0-	-0-
AGENCY SELF-GENERATED	-0-	-0-	-0-
RESTRICTED FUNDS*	-0-	-0-	-0-
FEDERAL FUNDS	-0-	-0-	-0-
LOCAL FUNDS	-0-	-0-	-0-
TOTAL	-0-	-0-	-0-

*Specify the particular fund being impacted.

B. Provide a narrative explanation of each increase or decrease in revenues shown in "A." Describe all data, assumptions, and methods used in calculating these increases or decreases.

No net increase or decrease in revenues will be realized.

FISCAL AND ECONOMIC IMPACT STATEMENT

WORKSHEET

III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NONGOVERNMENTAL GROUPS

- A. What persons or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

All entities obligated to obtain an air, water, solid waste, and/or hazardous waste permit are potentially affected by the proposed action; however, participation in the expedited permits program is voluntary.

Costs

When an applicant requests consideration for expedited processing, a brief "Request for Expedited Permit Processing" form, which can be completed in a nominal amount of time, must be submitted to the department. No fee is associated with this form.

As described in R.S. 30:2014.6(B), the fee for an expedited permit, to be billed by LDEQ after a final permit decision is reached, shall not exceed the maximum per hour overtime salary, including associated related benefits, of the civil service employee of the department who performs the work. This fee shall be charged for every overtime hour or portion thereof a department employee works processing the expedited permit or for every hour or portion thereof a contractor works processing the expedited permit.

The number of overtime or contractor hours worked will be dependent on the current availability of department resources, the size and complexity of the application being processed, etc.

In order to limit costs, the applicant may request that the expedited permit processing fee not exceed a maximum amount. If such a maximum amount is established, the number of overtime hours a department employee or contractor works processing the permit, modification, license, registration, or variance shall be limited accordingly. If further processing of the application is required, the department's continued review will no longer be handled on an expedited basis.

Benefits

Expedited permit processing allows the regulated community to act more quickly in response to market demands and conditions. Commencement of any necessary construction and operations may be authorized more expeditiously. As such, the revenue generated by the project would also be realized sooner.

- B. Also provide an estimate and a narrative description of any impact on receipts and/or income resulting from this rule or rule change to these groups.

No impacts on receipts or income will result.

IV. EFFECTS ON COMPETITION AND EMPLOYMENT

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

There will be no effect on competition or employment in the public or private sectors.

Non-expedited permit applications will continue to be processed during normal business hours. A final decision on each application must still adhere to the statutory deadlines imposed by R.S. 30:2022(B) and other applicable regulations. Participation in the expedited permit processing program will have no bearing on an application's assigned priority during normal business hours.

**ADMINISTRATIVE COSTS ASSOCIATED WITH THE EXPEDITED PERMIT PROCESSING PROGRAM
(PER APPLICATION PROCESSED)**

Division	Job Title	Pay Level	Hourly Rate ¹	Hours	Total Personnel Costs ²	Duties
Environmental Assistance	Environmental Project Specialist 3	TS309	\$21.09	0.50	\$13.71	Update TEMPO; make copy of application; notify designated staff.
Air Permits	Environmental Division Administrator	TS320	\$44.40	1.00	\$57.72	Query TEMPO; QA/QC list; update website to provide required notice to public (R.S. 30:2014.5).
	Environmental Project Specialist 3	TS309	\$21.09	2.00	\$54.83	Process request; review fee and compliance status per regulations; prepare recommendation for Administrator's review and approval; prepare necessary notifications to Financial Services Division; TEMPO data entry; send documents to EDMS; follow-up as necessary.
	Environmental Scientist Supervisor	TS314	\$29.59	0.50	\$19.23	Review application and assign permit; review and approve worklog.
	Administrative Assistant 4	AS611	\$15.16	0.25	\$4.93	Mail expedited letter via certified mail; input overtime into ISIS.
	Environmental Division Administrator	TS320	\$44.40	0.50	\$28.86	Review and approve recommendation to Asst. Secretary; review and approve worklog.
Financial Services	Accountant 3	AS615	\$19.87	1.00	\$25.83	Collectively: Assign RCAT; review timesheet(s) and k-time form(s); generate invoice; deposit payment; update databases.
	Accountant Manager 3	AS621	\$29.83	0.25	\$9.69	

Accountant Administrator 4

AS623

\$34.15

0.25

\$11.10

6.25	\$225.91
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¹Midpoint of pay schedule,
<http://www.dscs.state.la.us/ClassPay/pay/paygrid.htm>.

²Hourly Rate * Hours * 1.30 (associated related benefits).
 Operating costs per FTE are estimated to be approximately
 \$2500/year.

Annual administrative costs:

\$51,260.47

(\$225.91 * 104 * 12 months / 5.5
 months)

Operating costs (paper, ink, envelopes,
 certified mail, etc.):

\$2,500.00

(approximately \$11.02 per request, \$2500.00 / (104 * 12 / 5.5))

\$53,760.47
